

## REMARKS

Reconsideration of this application as amended is respectfully requested.

In the Office Action, claims 1 and 3-28 were pending and rejected. In this response, no claim has been canceled. Claims 1 and 3 have been amended to particularly point out and distinctly claim, in full, clear, concise, and exact terms, the subject matter which Applicant regards as his invention. No new matter has been added.

References mentioned on pages 2 and 4 of the present application were objected because they were not considered as valid IDS. It is respectfully submitted that those references had been submitted in an IDS dated April 20, 2004. Reconsideration of those references is respectfully requested.

Claims 1 and 3-13 are rejected under 35 U.S.C. § 112, second paragraph. The preambles of claims 1 and 3 were objected. In view of the foregoing amendments, it is respectfully submitted that the rejection has been overcome.

Claims 1, 3-23, and 28 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Deshpande et al. (U.S. 2002/0087728) in view of Larsson et al. (U.S. 2003/0110299) and further in view of Long et al. (U.S. 2002/0057446).

It is respectfully submitted that claims 1 and 3-28 include limitations that are not disclosed or suggested by Deshpande, Larsson, and Long, individually or in combination. Specifically, for example, independent claim 1 as amended includes limitations that a client has capabilities of reconstructing the codestream from a non-JPEG 2000 compliant format into a JPEG 2000 compliant codestream by adjusting values of a variety of markers including at least TLM and PLM markers to reflect the characteristics of the images in view of the JPEG 2000 standard, including making the markers to be JPEG 2000 compatible. As a result, an

ordinary JPEG 2000 decoder can be used to decode the reconstructed codestream. The support for these limitations can be found throughout the specification of the present application, such as, for example, pages 20-22 of the specification.

It is respectfully submitted that these limitations are absent from Deshpande and Larsson, individually or in combination. None of the clients of Deshpande and Larsson have such capabilities as described above, particularly, the JPEG 2000 codestream reconstruction capabilities.

The Office Action acknowledged that Deshpande and Larsson failed to disclose the limitations of “adjusting values of the at least markers to reassemble the new codestream to be compliant with the JPEG 2000 standard, including adjusting the TLM and PLM markers to be compatible with corresponding markers of the JPEG2000 standard, so that an ordinary JPEG 2000 coder can be invoked to decode the new codestream if, the portions of the compressed codestream received as a result of the request are not JPEG 2000 compliant.” However, Office Action contended that paragraphs [0061]-[0064] of Long disclose the limitation of (see 12/19/2007 Office Action, page 7). Applicant respectfully disagrees.

Although Long is related to a video processor; however, Long fails to disclose the specific limitations set forth above. Particularly, the cited paragraphs [0061]-[0064] of Long only briefly describe Figures 59-62 as part of the brief description of drawings section, which do not disclose any of the above limitations.

In addition, Long is not related to JPEG 2000 technology required by the present invention as claimed. In fact, there is no mention of JPEG 2000 within Long, which claims the priority of April 30, 1997, way before the JPEG 2000 standard was released. It is respectfully submitted that the present invention as claimed is not merely related to processing video

codestreams. Rather, the present invention as claimed is related to a specific way to process the codestream, particularly, using JPEG 2000 compatible markers.

Furthermore, there is no suggestion within Deshpande, Larsson, and Long to combine with each other. Here, Long is related to a specific multi-instruction stream processor having a specific hardware configuration. It is respectfully submitted that one with ordinary skill in the art, based on the teachings of Deshpande, Larsson, and Long, would not combine these references because such a combination lacks reasonable expectation of success and such a combination can only be based on the impermissible hindsight of the present application.

Even if Deshpande, Larsson, and Long were combined, such a combination still lacks the limitations set forth above. Therefore, for the reasons set forth above, it is respectfully submitted that independent claim 1 as amended is patentable over Deshpande, Larsson, and Long.

Similarly, independent claims 3, 14, and 22 include limitations similar to those recited in claim 1. Thus, for reasons similar to those set forth above, it is respectfully submitted that claims 3, 14, and 22 are patentable over Deshpande, Larsson, and Long. Given that the rest of the claims depend from one of the above independent claims, for reasons similar to those set forth above, it is respectfully submitted that the rest of the claims are also patentable over Deshpande, Larsson, and Long. Withdrawal of the rejections is respectfully requested.

In view of the foregoing, Applicant respectfully submits the present application is now in condition for allowance. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call/email the undersigned attorney.

Please charge Deposit Account No. 02-2666 for any shortage of fees in connection with this response.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN

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